

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

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HEATHER CHAMBERLIN, on  
behalf of herself and others similarly  
situated,

Plaintiff,

vs.

MULLOOLY, JEFFREY, ROONEY  
& FLYNN, LLP

Defendant.

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: 1:15-cv-02361 (JBS) (AMD)  
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: The Hon. Ann Marie Donio  
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: **Notice of Class Action**  
: **Settlement**  
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Heather Chamberlin (“Plaintiff”) and Mullooly, Jeffrey, Rooney & Flynn, LLP (“Defendant”) jointly notify this Court that they have reached, in principle, a class action settlement. To this end, they respectfully request that the Court vacate all pending deadlines and allow the parties 30 days within which to file:

1. A class action settlement agreement;
2. A proposed form notice of class action settlement to be disseminated to members of the settlement class;
3. A proposed order preliminarily approving the settlement; and
4. Plaintiff’s unopposed motion to preliminarily approve the class action settlement.

DATED: October 27, 2015

/s/ Jeanne Lahiff

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Attorneys for Defendant

Attorneys for Plaintiff

### **CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that, on October 27, 2015, I electronically filed a copy of the foregoing with the Court using the Clerk of Court's CM/ECF system, which will sent electronic notice to all counsel of record.

/s/ Jeanne Lahiff

Jeanne Lahiff